

Presentment Date: July 7, 2014 at 12:00 p.m. (EST)
Objection Deadline: July 7, 2014 at 11:30 a.m. (EST)
Hearing Date and Time (only if objections are filed): July 16, 2014 at 10:00 a.m. (EST)

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Counsel to the Debtor and Debtor in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

New York City Opera, Inc.

Debtor.

Chapter 11

Case No. 13-13240 (SHL)

**NOTICE OF PRESENTMENT OF DEBTOR'S THIRD MOTION FOR ENTRY
OF AN ORDER EXTENDING THE DEBTOR'S EXCLUSIVE PERIODS IN WHICH
TO FILE A CHAPTER 11 PLAN AND SOLICIT VOTES THEREON**

PLEASE TAKE NOTICE that New York City Opera, Inc., the above-captioned debtor and debtor in possession ("NYC Opera" or the "Debtor"), by and through its undersigned counsel, will present the *Debtor's Third Motion for Entry of an Order Extending the Debtor's Exclusive Periods in Which to File a Chapter 11 Plan and Solicit Votes Thereon* (the "Motion") to the Honorable Sean H. Lane, United States Bankruptcy Judge, for approval and signature, at Room 701 of the United States Bankruptcy Court for the Southern District of New

York ("**Bankruptcy Court**"), Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, on **July 7, 2014 at 12:00 p.m. (EST)**.

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to the relief requested in the Motion must: (i) be in writing; (ii) state the name and address of the responding party and the amount and nature of the claim or interest of such party; (iii) state with particularity the legal and factual basis of any response; (iv) conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York; and (v) be filed with the Bankruptcy Court, together with proof of service, electronically, in accordance with General Order M-399 (General Order M-399 and the User's Manual for the Electronic Case Filing System which can be found at the Bankruptcy Court's official website (www.nysb.uscourts.gov)), by registered users of the Bankruptcy Court's case filing system and by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect or any other Windows-based word processing format (with a hard copy delivered to Chambers) and served in accordance with General Order M-399, so as to be *actually received* not later than **11:30 a.m. (EST) on July 7, 2014** (the "**Objection Deadline**") and, such service shall be completed and actually received by the following parties on or prior to the Objection Deadline: (i) counsel to the Debtor, Lowenstein Sandler LLP, Attn: Kenneth A. Rosen, Esq. and Nicole Stefanelli, Esq., 65 Livingston Avenue, Roseland, NJ 07068; (ii) counsel to the Committee, Klestadt & Winters, LLP, Attn: Fred Stevens, Esq. and Sean Southard, Esq., 570 Seventh Ave., 17th Floor, New York, New York 10018; and (iii) the Office of the United States Trustee for the Southern District of New York, Attn: Susan D. Golden, Esq., U.S. Federal Office Building, 201 Varick Street, Room 1006, New York, NY 10014.

PLEASE TAKE FURTHER NOTICE that, unless an objection is timely served and filed on or before the Objection Deadline, the proposed order attached to the Motion may be approved and signed without further notice or a hearing by the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE if a written objection is timely served and filed, a hearing will be held on **July 16, 2014 at 10:00 a.m. (EST)** before the Honorable Sean

H. Lane, United States Bankruptcy Judge, at Room 701 of the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004. The objecting party(s) are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted upon default.

PLEASE TAKE FURTHER NOTICE that any such hearing may be adjourned without further notice other than by announcement of such adjournment in the Bankruptcy Court on the date scheduled for such hearing or for any such adjourned hearing.

Respectfully submitted,

Dated: June 30, 2014

LOWENSTEIN SANDLER LLP

/s/ Nicole Stefanelli

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